

Raymon C. Mitchell
Kocolene Marketing, LLC
P.O. Box 448
Seymour Indiana 47274-0448

Re: Exempt Construction and Operation Status,
CP 093-12604-00027

Dear Mr. Mitchell:

The application from Kocolene Marketing, LLC, received on August 15, 2000, has been reviewed and based on the provisions in 326 IAC 2-1.1-3, it has been determined that the following two (2) liquid ring pump operations, to be located at 2729 Mitchell Road, Bedford, Indiana 47421, are classified as exempt:

Two (2) liquid ring pumps, known as EU-01 and EU-02, exhausted to stacks S-001 and S-002, respectively, capacity: 1,500 standard cubic feet per minute, total.:

The following condition shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemption Alternative Opacity Limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

PMC/MES

cc: File - Lawrence County
Lawrence County Health Department
Air Compliance - Joe Foyst
Permit Tracking - Janet Mobley
Air Programs Section- Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Kocolene Marketing, LLC
Source Location: 2729 Mitchell Road, Bedford, Indiana 47421
County: Lawrence
SIC Code: 5541
Operation Permit No.: CP 093-12604-00027
Permit Reviewer: Paula M. Cognitore

The Office of Air Management (OAM) has reviewed an application from Kocolene Marketing, LLC relating to the construction and operation of two (2) liquid ring pumps.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities at this source.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The source consists of the following new facilities/units:

Two (2) liquid ring pumps, known as EU-01 and EU-02, exhausted to stacks S-001 and S-002, respectively, capacity: 1,500 standard cubic feet per minute, total.

Existing Approvals

There are no existing approvals for this source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
001	liquid ring pump	12.0	4.0	750	Ambient
002	liquid ring pump	12.0	4.0	750	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 15, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM ₁₀	0.00
SO ₂	0.00
VOC	9.34
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Benzene	3.46
Toluene	0.467
Ethyl benzene	1.03
Xylene	4.39
TOTAL	9.34

The potential to emit (as defined in 326 IAC 2-5.1-2) of VOC is less than ten (10) tons per year. Therefore, the source not is subject to the provisions of 326 IAC 2-1.1-3.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Lawrence County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.00
PM ₁₀	0.00
SO ₂	0.00
VOC	9.34
CO	0.00
NO _x	0.00
Single HAP	4.39
Combination HAPs	9.34

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPs is less than twenty-five (25) tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Lawrence County and the potential to emit VOC is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New source toxics control)

The HAP emissions from EU-01 and EU-02 are less than ten (10) tons per year of a single HAP and twenty-five (25) tons of any combination of HAPs; therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 8-1-6 (New facilities; general reductions requirements)

The VOC emissions from EU-01 and EU-02 are less than twenty-five (25) tons per year; therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Conclusion

The construction and operation of these two (2) liquid ring pumps shall be subject to the conditions of the attached proposed CP 093-12604-00027.

Appendix A: Emission Calculations

Page 1 of 1 TSD App A

Company Name: Kocolene Marketing, LLC
Address City IN Zip: 2729 Mitchell Road, Bedford, Indiana 47421
Exemption: CP 093-12604
Plt ID: 093-00027
Reviewer: Paula M. Cognitore
Date: August 15, 2000

POTENTIAL VOC EMISSIONS

VOC Concentration (lb/VOC)/(lb/air)	Density of Air (LB AIR/SCF)	Flow Rate (SCFM)/min	VOC Emissions (lb/day)	VOC Emissions (tons/yr)
0.000316	0.075	1500	51.2	9.34

HAP EMISSIONS

	Benzene	Toluene	Ethylbenzene	Xylene	Total
Weight %	37%	5%	11%	47%	
tons/yr	3.46	0.467	1.03	4.39	9.34

A pilot test was conducted at the site using a liquid ring pump on a single extractin well. The VOC concentration in the liquid ring pump air discharge was measured throughout the test. The VOC concentration ranged from 43 to 316 parts per million. Individual HAP concentrations were measured in the discharge air stream at a similiar site.

Methodology

VOC emissions = VOC Concentration*density of air*flow rate

HAP emissions = VOC Emissions * HAP %